

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

| | | |
|-------------------------------|---|---------------------|
| UNITED STATES OF AMERICA, | : | Civil No. 1:23CV202 |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| \$50,462.00 in U.S. CURRENCY, | : | |
| | : | |
| and | : | |
| | : | |
| \$10,000.00 in U.S. CURRENCY, | : | |
| | : | |
| Defendants. | : | |

VERIFIED COMPLAINT OF FORFEITURE

NOW COMES the Plaintiff, the United States of America, by and through Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, and respectfully states as follows:

1. This action is brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C) for the forfeiture of the defendant property, which constitutes or is derived from proceeds traceable to an offense constituting “specified unlawful activity” (as defined in 18 U.S.C. § 1956(c)(7)), or a conspiracy to commit such offense, including but not limited to the sale or exchange of a controlled substance in violation of state and federal law.

2. This action is also brought to enforce the provisions of 21 U.S.C. § 881(a)(6) for the forfeiture of the defendant property, which was furnished or intended to be furnished in exchange for a controlled substance, in violation of the Controlled Substances Act, 21 U.S.C. §§ 801 *et seq.*, or represents proceeds traceable to such an exchange.

3. The defendant properties are \$50,462.00 in U.S. currency and \$10,000.00 in U.S. currency, which were seized on October 20, 2022, in Winston-Salem, North Carolina, and are currently in the custody of the United States Customs and Border Protection.

5. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant properties. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395, because the defendant properties were seized while located within in the jurisdiction of this Court, and one or more of the acts giving rise to forfeiture occurred in this district.

5. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the Plaintiff will execute upon the properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

6. The facts and circumstances supporting the seizure and forfeiture of the defendant properties are contained in Exhibit A, attached hereto and wholly incorporated herein by reference.

WHEREFORE, the United States of America prays that process of a Warrant for Arrest and Notice *In Rem* be issued for the arrest of the defendant properties; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant properties be forfeited to the United States of America for disposition according to law; and that the United States of America be

granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

This the 6th day of March, 2023.

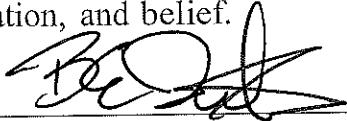
Respectfully submitted,

SANDRA J. HAIRSTON
United States Attorney

/s/ Nathan L. Strup
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VERIFICATION

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America, that the contents of the foregoing Complaint are true and correct to the best of my knowledge, information, and belief.



Brian Dexter
Special Agent
Homeland Security Investigations